

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

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UNITED STATES OF AMERICA

CASE NO.

3-24CR-287 E

v.

MERVIN CHARLES LEE II (01)  
VINCENT EDWARD WRIGHT JR. (02)  
JONATHAN JIMENEZ (03)

INDICTMENT

The Grand Jury Charges:

Count One

Conspiracy to Possess with Intent to Distribute a Schedule II Controlled Substance  
[Violation of 21 U.S.C. §§ 846, 841(a)(1) and 841(b)(1)(B)]

Beginning on or about March 1, 2024, and through on or about June 20, 2024, in the Dallas Division of the Northern District of Texas and elsewhere, the defendants, **Mervin Lee and Vincent Edward Wright Jr.**, knowingly and intentionally combined, conspired, confederated, and agreed with each other and other persons, known and unknown to the Grand Jury, to commit the following offense against the United States: to possess with the intent to distribute 40 grams or more of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propenamide, also known as "fentanyl," a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1) and (b)(1)(B).

All in violation of 21 U.S.C. § 846.

Count Two

Possession with Intent to Distribute a Controlled Substance  
[Violation of 21 U.S.C. § 841(a)(1) and (b)(1)(C)]

On or about June 20, 2024, in the Dallas Division of the Northern District of Texas, the defendant, **Mervin Charles Lee II**, did knowingly and intentionally possess with intent to distribute a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propenamide, also known as “fentanyl,” a Schedule II controlled substance.

In violation of 21 U.S.C. § 841(a)(1) and (b)(1)(C).

Count Three

Possession with Intent to Distribute a Controlled Substance  
[Violation of 21 U.S.C. § 841(a)(1) and (b)(1)(C)]

On or about June 20, 2024, in the Dallas Division of the Northern District of Texas, the defendant, **Vincent Edward Wright Jr.**, did knowingly and intentionally possess with intent to distribute a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propenamide, also known as “fentanyl,” a Schedule II controlled substance.

In violation of 21 U.S.C. § 841(a)(1) and (b)(1)(C).

Count Four

Possession of a Firearm in Furtherance of a Drug Trafficking Crime  
[Violation of 18 U.S.C. § 924(c)(1)(A)]

On or about June 20, 2024, in the Dallas Division of the Northern District of Texas, the defendant, **Vincent Edward Wright Jr.**, did knowingly possess a firearm, to wit: a Mossberg, Model 500 CT, 20-gauge shotgun, bearing serial number H977087, in furtherance of a drug trafficking crime for which the defendant may be prosecuted in a court of the United States, that is conspiracy to possess with the intent to distribute 40 grams or more of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propenamide, also known as “fentanyl,” a Schedule II controlled substance, in violation of 21 U.S.C. §§ 846 and 841(a)(1) and (b)(1)(B) as charged in Court One of this indictment.

In violation of 18 U.S.C. § 924(c)(1)(A).

Count Five

Engaging in the Business of Manufacturing  
and Dealing in Firearms without a License

[Violation of 18 U.S.C. §§ 922(a)(1)(A) and 924(a)(1)(D)]

From on or about May 1, 2024, through on or about June 20, 2024, in the Dallas Division of the Northern District of Texas, the defendant, **Jonathan Jimenez**, not being a licensed manufacturer and dealer of firearms within the meaning of Chapter 44 of Title 18, United States Code, did willfully engage in the business of manufacturing and dealing in firearms.

In violation of 18 U.S.C. §§ 922(a)(1)(A) and 924(a)(1)(D).



FORFEITURE NOTICE

[21 U.S.C. § 853(a), 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c)]

Pursuant to 21 U.S.C. § 853, upon conviction of any offense violating 21 U.S.C. §§ 841 and 846, the defendants, **Mervin Charles Lee II**, **Vincent Edward Wright Jr.**, and **Jonathan Jimenez**, shall forfeit to the United States of America any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offense(s) and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the offense(s). The property to be forfeited includes, but is not limited to:

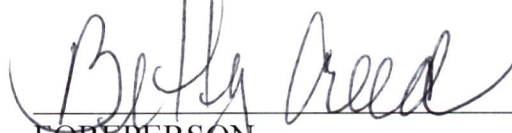
- a. a Griffin Armament, Model MK1, multi-caliber rifle, bearing serial number MK13438 and any ammunition recovered with the firearm;
- b. a HS Produkt, Model XD45, .45 caliber pistol bearing serial number XD688433, and any ammunition recovered with the firearm;
- c. a Bersa, Model Thunder, .380 caliber pistol, bearing serial number G22423, and any ammunition recovered with the firearm;
- d. a FEG, Model PA63, 9mm caliber pistol, bearing serial number HC6780, and any ammunition recovered with the firearm;
- e. a Smith & Wesson, Model: SD9VE, 9mm caliber pistol, bearing serial number HFB2030, and any ammunition recovered with the firearm;
- f. a Kimber, Model Super Carry Pro, .45 caliber pistol, bearing serial number KR125263, and any ammunition recovered with the firearm;
- g. a Taurus, Model PT111 Millenium G2, 9mm caliber pistol, bearing serial number FG190144, and any ammunition recovered with the firearm;
- h. a Walther, Model CCP, 9mm caliber pistol, bearing serial number WK097731, and any ammunition recovered with the firearm;

- i. a Radical Firearms LLC, Model RF-15, .300 caliber rifle, bearing serial number 23-009978, and any ammunition recovered with the firearm;
- j. a Kel-Tec, CNC Industries, Inc., Model Sub-2000, 9mm caliber rifle, bearing serial number F6510, and any ammunition recovered with the firearm;
- k. a HS Produkt (Im Metal), Model XDS, 9mm caliber pistol, bearing serial number BA678784, and any ammunition recovered with the firearm;
- l. a Ruger, Model Ruger-57, 5.7mm caliber pistol, bearing serial number 643-93680, and any ammunition recovered with the firearm;
- m. a Smith & Wesson, Model M&P Shield, 9mm caliber pistol, bearing serial number JEJ7630, and any ammunition recovered with the firearm;
- n. a Glock, Model 27GEN4, .40 caliber pistol, bearing serial number UFT538, and any ammunition recovered with the firearm;
- o. a Mossberg, Model 500 CT, 20-gauge shotgun, bearing serial number H977087, and any ammunition recovered with the firearm; and
- p. a Glock, Model 48, 9mm pistol, bearing an obliterated serial number, and any ammunition recovered with the firearm.

Pursuant to 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c), upon conviction of any offense violating 18 U.S.C. § 924 or 21 U.S.C. §§ 846 or 841, the defendant shall forfeit to the United States of America any firearm or ammunition involved or used in the commission of the offense, including, but not limited to:

- a. a Mossberg, Model 500 CT, 20-gauge shotgun, bearing serial number H977087, and any ammunition recovered with the firearm.

A TRUE BILL

  
FOREPERSON

LEIGHA SIMONTON  
UNITED STATES ATTORNEY

  
JOSEPH T. LO GALBO

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FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

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THE UNITED STATES OF AMERICA

v.

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VINCENT EDWARD WRIGHT JR. (02)  
JONATHAN JIMENEZ (03)

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INDICTMENT

21 U.S.C. §§ 846, 841(a)(1) and 841(b)(1)(B)  
Conspiracy to Possess with Intent to Distribute a Schedule II Controlled Substance  
(Count 1)

21 U.S.C. § 841(a)(1) and (b)(1)(C)  
Possession with Intent to Distribute a Controlled Substance  
(Count 2)

21 U.S.C. § 841(a)(1) and (b)(1)(C)  
Possession with Intent to Distribute a Controlled Substance  
(Count 3)

18 U.S.C. § 924(c)(1)(A)  
Possession of a Firearm in Furtherance of a Drug Trafficking Crime  
(Count 4)

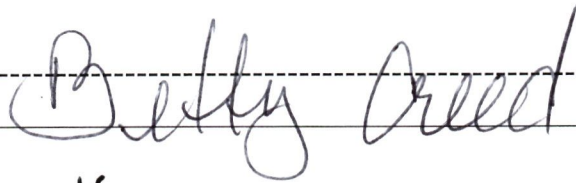
18 U.S.C. §§ 922(a)(1)(A) and 924(a)(1)(D)  
Engaging in the Business of Manufacturing and Dealing in Firearms without a License  
(Count 5)

21 U.S.C. § 853 (a)  
Forfeiture Notice

5 Counts

A true bill rendered

DALLAS



FOREPERSON

Filed in open court this 16 day of July, 2024.

**No Warrant Needed for Jonathan Jimenez and Vincent Edwards Wright Jr.  
Defendant Mervin Charles Lee (01) in Federal Custody since 6/21/2024 in  
Limestone County Detention Center**



UNITED STATES MAGISTRATE JUDGE

Magistrate Court Number: 3:24-MJ-557-BK

3:24-MJ-568-BK